

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DANIELLE PALLOTTA and CHERYL
LAFLAMME, on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

Civil Action No. 4:22-cv-10361-ADB

UNIVERSITY OF MASSACHUSETTS
MEMORIAL MEDICAL CENTER,
KRONOS INCORPORATED, and UKG
INC.,

Defendants.

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENT**

Plaintiffs Danielle Pallotta and Cheryl LaFlamme (collectively, the "Plaintiffs"), by and through their undersigned counsel, hereby move this Court for preliminary approval of class action settlement.

Dated: May 12, 2023

Respectfully Submitted,

/s/ Jeremiah Frei-Pearson

Jeremiah Frei-Pearson (*Pro Hac Vice*)

D. Greg Blankinship (BBO# 655430)

Finkelstein, Blankinship, Frei-Pearson & Garber, LLP

One North Broadway, Suite 900

White Plains, NY 10601

jfrei-pearson@fbfglaw.com

gblankinship@fbfglaw.com

Kathy Jo Cook (BBO # 631389)

Sheff & Cook, LLC

10 Tremont Street, 7th Floor

Boston, MA 02108

kjcook@kjclawfirm.com

Attorneys for Plaintiffs and the Proposed Classes
CERTIFICATE OF SERVICE

This hereby certifies that on this 12th day of May, 2023, this document, filed through this Court's ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and a paper and/or electronic copy shall be served on non-registered participants pursuant to applicable rules.

Stephen T. Paterniti, BBO # 564860

JACKSON LEWIS P.C.

75 Park Plaza, 4th Floor

Boston, MA 02116

Tel: (617) 367-0025

stephen.paterniti@jacksonlewis.com

Attorneys for Defendant UMass Memorial Medical Center

/s/ Jeremiah Frei-Pearson

Finkelstein, Blankinship, Frei-Pearson & Garber, LLP